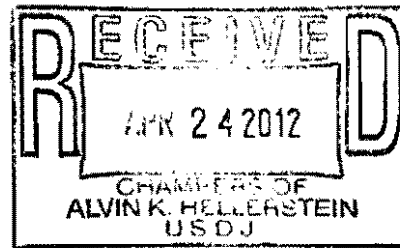


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April 23, 2012

By Federal Express
Hon. Alvin K. Hellerstein
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007-1312



Re: Knoll, Inc. v. Moderno, Inc. et al., 1:11-cv-00488 (S.D.N.Y.) (AKH)

Dear Judge Hellerstein:

I am enclosing a courtesy copy of the joint motion of counsel for defendants (this firm and co-counsel Robert Tilewick, Esq.), pursuant to Local Rule 1.4, for leave to withdraw as counsel of record in this case.

This firm, which has acted as primary and lead counsel for defendants, has been discharged by the defendants as their counsel in this case. Settlement discussions over the past month, during which discovery matters were put on hold, have proved unsuccessful; accordingly, at this time, various decisions must be made and actions taken in terms of discovery and other matters covered by the case management order. While we still require formal leave of Court to withdraw as counsel of record, we lack any authority to make decisions or take actions on behalf of defendants in the litigation when there is no longer any attorney client relationship and defendants have instructed us not to continue to represent them. Accordingly, the within motion asks for stay of proceedings so that defendants may retain new counsel and avoid prejudice. This would represent the first extension of discovery deadlines in this case.

Respectfully submitted,

A handwritten signature of Salem M. Katsh in black ink.
Salem M. Katsh

cc: Robert Tilewick, Esq.
George Gottlieb, Esq.

motion for stay denied, in order to avoid prejudice to pl. motion to be discharged as counsel is denied w/out a showing that all pending proceedings have been completed. If this party fails to cooperate or retain substitute counsel a default judgment may be entered. 5/4/12

Judge wrote:

“Motion for stay denied, in order to avoid prejudice to plaintiff. Motion to be discharged as counsel is denied without a showing that all pending proceedings have been completed. If the party fails to cooperate, or retain substitute counsel, a default judgment may be in order.

5/4/12

Alvin K. Hellerstein”